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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSALYN LOPEZ, an individual,

Plaintiff,

vs.

XL, INC. d/b/a GREAT CLIPS, a Domestic Corporation; DOES I through X, inclusive; ROE CORPORATIONS I through X, inclusive.

Defendants.

CASE NO: 2:17-cv-00442-MMD-PAL

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE AND
RESPOND TO DISPOSITIVE
MOTIONS
(Second Request)**

COMES NOW, Plaintiff, ROSALYN LOPEZ (hereinafter “Plaintiff”), by and through her counsel, the law firm of Hatfield & Associates, Ltd., and Defendant XL, INC. d/b/a GREAT CLIPS (hereinafter “Defendant”), by and through its counsel, HUTCHISON & STEFFEN, LLC, hereby stipulate to continue the deposition of Defendant’s person most knowledgeable, that was scheduled for January 18, 2018, thirty days’ time from the close of discovery of this case, January 19, 2018, to February 19, 2018. The parties’ counsel also requests that the dispositive motion deadline set forth in the current Extension of Scheduled Deadlines (ECF No. 30) be extended an additional 30 days.

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STIPULATION

The current deadline for dispositive motions is February 16, 2018. The parties respectfully request that the deadline for dispositive motions be moved to March 19, 2018, and any response date by extended by two weeks. All other deadlines set forth in ECF No. 30 will remain the same. This request is submitted pursuant to LR 6-1, 6-2, 7-1 and 26-4 and is the parties' first request for an extension concerning only the dispositive motions, and the second request to extend deadlines pertaining to the parties scheduling order and discovery plan.

I. Basis for Extension

There is good cause for this requested stipulation for the extension as the person most knowledgeable deposition has yet to be completed. The Parties request this extension to allow for a time convenient with the Parties and their counsel to arrange for a mutually-convenient time for the taking of the deposition of the person most knowledgeable, considering the prior holiday season and the calendars of counsel and the deponent. As the deposition may affect dispositive issues in the case, the Parties also request that the dispositive motion deadline set forth in the current Extension of Scheduled Deadlines (ECF No. 30) be extended an additional 30 days.

II. Proposed Modification

The parties stipulate and request that the time for taking the deposition of Defendant's person most knowledgeable be continued to **February 19, 2018** and that dispositive motions must now be filed on or before **Monday, March 19, 2018**. For all the reasons stated above, good cause exists to extend the dispositive motion deadline in this matter. The Parties do not seek extension of any other

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1 discovery deadline.

2 **IT IS SO STIPULATED.**

4 Dated: January 22, 2018

5 HATFIELD & ASSOCIATES, LTD.

6 /s/ *Trevor J. Hatfield*

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11 Attorney for Plaintiff

Dated: January 22, 2018

HUTCHISON & STEFFEN, LLC

/s/ *Chris Orme*

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Attorneys for Defendant,
XL, Inc. d/b/a Great Clips

15 **IT IS SO ORDERED.**

16 Dated this 29th day of January, 2018.


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18 MAGISTRATE/JUDGE
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CERTIFICATE OF SERVICE

1 I certify that on the 22nd day of January, 2018, I electronically filed the foregoing

2 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (Second Request)**

3 with the Clerk of the Court using the ECF system which served the parties hereto electronically.

4 DATED: January 22, 2018

5 **HATFIELD & ASSOCIATES, LTD.**

6 */s/ Freda P. Brazier*

7 By: _____

An employee of Hatfield & Associates, Ltd.

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